

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

UNITED STATES OF AMERICA,

v.

DENNY ZHENG,

Defendant.

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**Case No. 19 CR 158-6
Judge Kendall**

**DEFENDANT DENNY ZHENG'S AGREED MOTION TO MODIFY
CONDITIONS OF PRE-TRIAL RELEASE TO ALLOW HIM TO TRAVEL TO
LAS VEGAS, NEVADA FOR A FAMILY VACATION DURING THE TIME
PERIOD FROM JANUARY 14, 2022 THROUGH JANUARY 17, 2022**

Defendant, Denny Zheng, by and through his undersigned counsel, by agreement, respectfully moves this Court for the entry of an Order modifying the conditions of his pre-trial release to allow him to travel to Las Vegas, Nevada during the time period from January 14, 2022 through January 17, 2022 for purposes of a family vacation, and states as follows:

1. Mr. Zheng requests permission to travel to Las Vegas, Nevada during the time period of January 14, 2022 through January 17, 2022 for the purposes of a family vacation.
2. Mr. Zheng's counsel has conferred with the Government and with Mr. Zheng's assigned Pre-Trial Services Officer.
3. The Government has agreed to this Motion.
4. Mr. Zheng's counsel also provided notice to Mr. Rhel of Pre-Trial Services. Mr. Rhel previously confirmed that Pretrial does not take a position on motions to modify Mr. Zheng's conditions of pre-trial release because Mr. Zheng has not been on Pretrial supervision.
5. Mr. Zheng's counsel is also submitting an Agreed Order to the Court in connection

with this Motion.

WHEREFORE, Defendant, Denny Zheng, by and through his undersigned counsel, and by agreement, respectfully request the entry of an Order modifying the conditions of his pre-trial release so as to grant him leave to travel to Las Vegas, Nevada between January 14, 2022 and January 17, 2022 for purposes of a family vacation, and for such other and further relief as is appropriate.

RESPECTFULLY SUBMITTED,

By: s/Michael I. Leonard
Counsel for Mr. Zheng

LEONARD TRIAL LAWYERS LCC

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CERTIFICATE OF SERVICE

The undersigned states that, on January 3, 2021, he caused the above to be served on all counsel of record by way of ECF filing.

RESPECTFULLY SUBMITTED,

By: s/Michael I. Leonard
Counsel for Mr. Zheng